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In the Matter of )

Technical Requirements to Enable )  
Blocking of Video Programming )  
Based on Program Ratings )

ET Docket No. 97-206

Implementation of Sections 551 (c), )  
(d) of the Telecommunications )  
Act of 1996 )

Fifth Further Notice of )  
Proposed Rule Making )

COMMENTS OF

ZENITH ELECTRONICS CORPORATION

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**COMMENTS OF  
ZENITH ELECTRONICS CORPORATION**

Zenith Electronics Corporation respectfully submits these comments on the above-captioned proceeding. Zenith is a long-time leader in consumer electronics and cable technologies, a pioneer in incorporating closed-caption technology into television receivers, and the developer of the FCC-adopted digital television terrestrial transmission subsystem.

Zenith, which has led industry efforts to develop cost-effective solutions for technologies for blocking unwanted programming, joins and strongly endorses the extensive comments filed by

the Consumer Electronics Manufacturers Association (CEMA). Zenith was among the first TV manufacturers to include parental choice channel blocking features in television receivers, and based on our early pioneering work in closed-caption technology, Zenith has been a proponent of implementing ratings-based blocking capability on Line 21 of the vertical blanking interval of NTSC broadcast television signals. In addition, Zenith executives have chaired CEMA's R-4.3 Subcommittee working on this issue for the past several years.

For the sake of brevity, we will not repeat all of the compelling points made by CEMA, but instead will emphasize a few areas regarding the implementation of the so-called "V-Chip" capability -- namely, (1) the unrealistic implementation timetable proposed in the Notice, (2) the need for a single common rating system and for rapid Commission adoption of that system prior to incorporation of the blocking feature in future television receivers, and (3) similar concerns as they relate to the advent of digital television receivers.

**I. The Commission's timetable for implementation is unrealistically aggressive and should be delayed until at least July 1999.**

As the Commission already recognizes, television manufacturers operate on an 18-24 month product development and introduction timetable. The simple truth is that it takes manufacturers that long to go from design to production of a new model or feature. Much of this time is consumed by the intensive software development required to incorporate new features into TV chassis designs. The Commission recognized this in its closed-caption mandates and should do so in implementing blocking technology as well.

For more than three years, a CEMA subcommittee chaired by Zenith executives has been investigating the use of Line 21 Extended Data Service (XDS) capability as a means for delivering

content-based signals to activate a parental choice blocking feature in future analog television receivers. We have emphasized consistently to the Commission that the minimum time needed to implement such a feature is 18-24 months after Commission approval of (1) the ratings system, and (2) the methodology for transmitting that ratings system.

Accordingly, we were surprised to see the Commission propose a shorter time frame, which is unrealistic and, in fact, impossible to implement. Competitive market forces will push each manufacturer to bring this desirable consumer feature to market as soon as practical, but considering the fact that we are now developing products for introduction in mid-1999, that should be the earliest required date for first commercial availability of television receivers with blocking capability based on transmitted rating information. Requiring mandatory implementation any sooner, even if possible, would represent a significant burden on consumer electronics manufacturers.

**II. The Commission must rapidly approve the rating system for program providers and a single technical standard for broadcasters.**

For consumer electronics manufacturers to meet even a July 1999 deadline for initial introduction of television receivers with VBI-based program blocking capabilities, the Commission must act quickly. We urge the Commission to establish a single, minimum rating system for program providers before issuing any order requiring action on the part of receiver manufacturers. A single system is needed for CEMA members to incorporate the rating system into the advisory system standard and for manufacturers to have the time to develop the necessary firmware for implementation.

The Commission may wish to allow the flexibility for other future rating systems, and manufacturers should be allowed to incorporate other systems into their sets. However, in order to avoid consumer disenchantment on a large scale -- and, indeed, to avoid frustrating the parental control envisioned by the law -- it is imperative that the Commission follow the logic it wisely used in developing the closed-caption standard: identify a single system with minimum requirements and let the marketplace add extensions as appropriate.

To give manufacturers the certainty needed to develop the technology, we also urge the Commission to approve the final technical transmission standard for broadcasters -- EIA-744, "Transport of Content Advisory Information Using Extended Data Service (XDS)," which will be included in the next revision of the EIA-608 industry standard for VBI Line 21 transmissions.

**III. The Commission should plan for program blocking capability in the digital world, paying special attention to digital television receivers, introduction timetables, technical challenges and commonality with analog systems.**

Implementing program blocking capability in the digital world will require different technology than that which is contemplated for analog receivers. As in analog television, the implementation timetable for digital television (DTV) will necessarily be linked to product development schedules. Because of the huge technical challenges involved in bringing DTV to market by late 1998, we believe a reasonable timetable for the first implementation of program blocking capability in digital receivers should be mid-1999 or later.

On a related matter, since DTV receivers are expected to be dual mode -- that is, capable of receiving both analog and digital programming -- for many years, we strongly urge that the ratings system for digital programs be identical to that used with analog television broadcasts.

Using a different ratings approach for digital programming would lead to consumer confusion and inhibit acceptance and use of parental blocking features in both analog and digital broadcasts.

#### IV. Conclusion

Zenith supports the implementation of content-based program blocking features in television sets, and urges the Commission to act quickly in adopting a single, minimum rating system to which all program producers and manufacturers are required to comply. In adopting this single system, the Commission should consider the design and development timetables that industry experience has proven are necessary in order to deliver the best possible products to customers at the lowest possible cost. Finally, we urge the Commission to be sensitive to the product development cycles for digital television products and to the need for consistent ratings systems between analog and digital systems.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nick Mehta", followed by a horizontal line.

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